

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN

In re:
RICHARD BURLINGAME

Debtor(s),

Case No. 22-02404
Chapter 13
Hon. John T. Gregg
Filed: November 27, 2022

**DEBTOR'S RESPONSE IN OPPOSITION TO
THE TRUSTEE'S MOTION TO DISMISS CHAPTER 13 CASE**

The Debtor, by and through his attorneys at Dietrich & Kenyon, PLLC, hereby state the following in opposition to the Trustee's Motion to Dismiss Chapter 13 Case (DN 36):

1. The Debtor provided all requested documents to the Trustee on or before February 1, 2023.
2. The Debtor filed the First Preconfirmation Amended Chapter 13 Plan [DN 38] and Amended Schedule J [DN 39] on or about February 9, 2023 to rectify the Trustee's Motion to Dismiss.

WHEREFORE, the Debtor respectfully requests that the Court deny the Trustee's Motion to Dismiss Chapter 13 Case and grant any other relief deemed equitable and just.

Respectfully Submitted,

DIETRICH & KENYON, PLLC

Dated: 2/20/2023



Aaron J. Kenyon (P67589)
Laura C. Duncan (P84159)
Belande J. Pettigrew (P85208)
Attorneys for Debtor(s)
1427 West Saginaw St., Ste 170
East Lansing, MI 48823
Phone: (517) 374- 8000 Fax: (517) 374-9080
contact@DietrichKenyon.com